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Honorable Joseph F. Bianco
United States District Judge
Eastern District of New York
United States Courthouse
100 Federal Plaza
Central Islip, New York

BY ECF

Re: United States v. Kenner & Constantine
13 Cr. 607 (JFB)

Dear Judge Bianco:

Defendant Tommy Constantine and *pro se* co-defendant Philip Kenner's (collectively "Defendants") oppositions to the government's Forfeiture Motion is due today, August 29, 2018. The forensic accountant appointed by the Court for Defendants will not complete his examination for another ten to fourteen days. Upon receipt of the report, Defendants can file their oppositions within one week. For this reason, Defendants respectfully request that their filing deadline be extended to September 21, 2018. The government, by Assistant United States Attorney Diane Leonardo, takes no positions as to this application but requests that any extension include the existing one month reply deadline. The proposed schedule will not affect the motion argument date set for November 2, 2018.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Diane Leonardo (by ECF)
AUSA Madeline O'Connor (by ECF)
AUSA Saritha Komatireddy (by ECF)
AUSA Matthew Haggans (by ECF)
Philip Kenner (by hand)